

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

RECEIVED

JAN 10 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
)

Federal-State Joint Board on)
Universal Service)
_____)

CC Docket 96-45

Reply Comments of
KMC Telecom, Inc.

Mark P. Sievers
Tamar E. Haverty
SWIDLER & BERLIN, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7500

Counsel for KMC Telecom, Inc.

January 10, 1997

No. of Copies rec'd
List ABCDE

024

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

<hr/>)	
In the Matter of)	
)	
Federal-State Joint Board on)	CC Docket 96-45
Universal Service)	
<hr/>)	

**Reply Comments of
KMC Telecom, Inc.**

Table of Contents

Introduction and Summary	1
I. Administration -- Contributions to the Universal Service Fund	4
A. Funding for Universal Service Should Be Explicit on Customer Bills	4
B. Funding for Universal Service Should Not Be Based on Carriers' Retail Revenues	5
C. Universal Service Fund Assessments Cannot Be Recovered In Prices for Unbundled Network Elements or Wholesale Prices	6
II. Subsidies Must Be Portable	8
III. The Proxy Cost Model Must Be Based on Forward-Looking Economic Costs	10
IV. Conclusion	13

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20054

In the Matter of)

Federal-State Joint Board on)
Universal Service)
_____)

CC Docket 96-45

**Reply Comments of
KMC Telecom, Inc.**

KMC Telecom, Inc. ("KMC"), by its undersigned counsel and pursuant to Public Notice, DA 96-1891 (released November 18, 1996), submits these Reply Comments on the Recommended Decision of the Joint Board issued in the above-captioned proceeding.^{1/}

Introduction and Summary

KMC is a new provider of competitive local access service throughout the nation. With the passage of the Telecommunications Act of 1996,^{2/} KMC plans to provide local exchange service in competition with incumbent local exchange carriers ("ILECs"), focusing its initial efforts on smaller markets outside of the 100 largest Metropolitan Statistical Areas ("MSAs").

^{1/} *In the Matter of Federal-State Joint Board on Universal Service*, Recommended Decision of the Joint Board, CC Docket No. 96-45 (rel. Nov. 8, 1996) ("Recommended Decision").

^{2/} Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56 (1996) ("1996 Act").

As a new entrant in smaller markets, KMC has a keen interest in the Federal Communications Commission's ("FCC") efforts to adopt universal service rules consistent with § 254 of the 1996 Act. As a competitive local exchange carrier ("CLEC") and a provider of interstate telecommunications services, KMC will be impacted by both the funding and disbursement mechanisms that the FCC adopts.

KMC urges the FCC to adopt universal service funding and distribution mechanisms that are competitively neutral, explicit, and sufficient to ensure quality telecommunications services at affordable rates for all regions of the nation. KMC files these Reply Comments to respond to certain recommendations, made by the Joint Board and parties commenting on the Joint Board's Recommended Decision, that KMC believes are inconsistent with these overarching goals of universal service. In particular:

- ▶ ***Universal Service Support Should Be Explicitly Reflected on Customers' Bills.*** The FCC should reject the Joint Board's recommendation that universal service support obligations not be explicitly reflected as surcharges on customers' bills. Customers will ultimately pay for universal service programs and the support they provide to low income customers, customers living in high cost areas, schools, libraries and rural health care providers should be explicitly reflected on their telephone bills.
- ▶ ***Funding for Universal Service Should Not Be Based on Carriers' Retail Revenues.*** The FCC should adopt the Joint Board's recommendation that contributions for universal

service be based on gross telecommunications revenues less payments to telecommunications carriers.

- ▶ ***Universal Service Fund Assessments Cannot Be Recovered In Prices for Unbundled Network Elements or Wholesale Prices.*** The Joint Board's recommendations regarding recovery of universal service fund contributions should be clarified with respect to interconnection, unbundled elements and wholesale prices. In its Interconnection Order,^{2/} the FCC prohibited states from recovering universal service costs from surcharges added to interconnection and unbundled network element prices. The FCC should apply the same prohibition to the recovery of federal universal service funds.
- ▶ ***Subsidies Must Be Portable.*** Any carrier that provides services to subsidized low income customers, customers living in high-cost areas, schools, libraries or rural health care providers should be eligible for the subsidies associated with such customers.
- ▶ ***The Proxy Cost Model Must Be Based on Forward-Looking Economic Costs.*** The FCC should adopt the Joint Board's recommendation that high-cost support be based on a proxy cost model that estimates the forward-looking costs of an efficient market entrant. The embedded costs of incumbent providers should not be used as the basis for determining universal service support.

^{2/} *In the Matter of Implementation of Local Competition Provisions in the Telecommunications Act of 1996*, First Report and Order, FCC 96-325 (rel. Aug. 8, 1996) ("Interconnection Order").

I. Administration -- Contributions to the Universal Service Fund

A. Funding for Universal Service Should Be Explicit on Customer Bills

In its Recommended Decision, the Joint Board rejected suggestions that universal service support be funded by an end-user surcharge and argued that carriers rather than customers should provide universal service support.^{4/} The FCC should reject this analysis and recommendation and adopt the recommendation of the many parties that advocate recovery of universal service contributions through an explicit surcharge on customers' bills.^{5/} As most of these parties recognize, the cost of universal service funding will ultimately be borne by the consumers of telecommunications services. The Joint Board fails to recognize that carriers will inevitably pass on their universal service costs to their customers. A retail surcharge is competitively neutral and the best way to meet §254(e)'s requirement that any universal service support be explicit. If consumers are ultimately required to pay for subsidies for low income customers, customers living in high-cost service areas, schools, libraries and rural health care providers, they are entitled to know how much support they are providing.

^{4/} Recommended Decision at ¶ 812.

^{5/} Ameritech Comments at 30-31; AT&T Corp. ("AT&T") Comments at 4-5, 8-9; BellSouth Comments at 14-16; Competitive Telecommunications Association ("CompTel") Comments at 14; LCI International, Inc. ("LCI") Comments at 14; MFS Communications Company, Inc. ("MFS") Comments at 12; NYNEX Comments at 23; Rural Telecommunications Carriers Comments at 35-36; SBC Communications, Inc. ("SBC") Comments at 11; Sprint Corp. ("Sprint") Comments at 10; United States Telephone Association ("USTA") Comments at 22; US West, Inc. ("US West") Comments at 45-46; WorldCom, Inc. ("WorldCom") Comments at 40.

B. Funding for Universal Service Should Not Be Based on Carriers' Retail Revenues

Some parties, especially ILECs, advocated the adoption of a carrier's interstate retail revenues as the basis for assessing contributions to the universal service fund. KMC urges the FCC to reject these arguments and adopt the Joint Board's recommended assessment method (gross revenues net of payments to other telecommunications carriers).^{6/} The gross revenues net of payments approach has many advantages over the interstate retail revenue approach. As the Joint Board noted, the gross revenues net of payments approach eliminates the so-called "double counting problem" (assessing two contributions on the same service), more closely approximates a value-added contribution, and would be administratively easy to implement.^{7/}

The figures provided by NYNEX show that using interstate retail revenues as the basis of universal service assessments would result in interexchange carriers ("IXCs") funding 81% of the universal service fund; local exchange carriers ("LECs"), 14%; and other carriers, 5%.^{8/} On the other hand, NYNEX's figures show that under the funding basis recommended by the Joint Board, IXCs would provide 55% of the funding; LECs, 40%; and other carriers, 5%.^{9/} Without agreeing that these figures are accurate, KMC submits that NYNEX has provided evidence in *support* of the Joint Board's recommendation. Section 254 requires carriers to contribute to

^{6/} Recommended Decision at ¶ 778.

^{7/} Recommended Decision at ¶ 807.

^{8/} NYNEX Comments at 19.

^{9/} NYNEX Comments at 19 (NYNEX counts only interstate revenues in this calculation).

universal service on an equitable and nondiscriminatory basis. Requiring IXC's to shoulder over 80% of the funding for universal service hardly appears equitable, especially considering that LECs are the primary beneficiaries of universal service subsidies.

The FCC should also include both intra- and interstate gross revenues in the funding base. The combined revenue base better represents the evolving communications market where the intra- and interstate distinctions are fading. Including all revenues may be administratively simpler since non-regulated carriers typically do not jurisdictionally separate revenues. Including all revenues also reflects the fact that promoting access to telephone service is not an exclusively interstate objective, but promoting universal service obviously affects both intra- and interstate services and communications.

For the foregoing reasons, the FCC should require contributions to the universal service fund to be based on intra- and interstate gross revenues net of payments to other telecommunications carriers.

C. Universal Service Fund Assessments Cannot Be Recovered In Prices for Unbundled Network Elements or Wholesale Prices

In developing its recommendations, the Joint Board was faced with a massive undertaking, and KMC applauds the Joint Board for its efforts and many of its recommendations. However, the recommendation made by the Joint Board regarding the recovery of universal service funding in the prices of unbundled network elements is at best confusing, and at worst, misleading:

[t]he Joint Board, acknowledging GTE's comments that some ILECs may not be free to adjust rates to account for the amount of their contributions to universal service support, recommends clarifying that, under the Commission's section 251 rules, ILECs are prohibited from incorporating universal service support into rates for unbundled network elements. We note, however, that carriers are permitted under section 254 to pass through to users of unbundled elements an equitable and nondiscriminatory portion of their universal service obligation.^{10/}

KMC respectfully submits that in the above-quoted paragraph, the Joint Board unnecessarily confuses the issue, misinterprets the 1996 Act, and contradicts the FCC's Interconnection Order. The FCC has already found that funding for any universal service mechanism may not be included in the rates for elements and services under §§251 and 252.^{11/} Even if §254 *permits* carriers to pass through to users of unbundled elements a portion of the carrier's universal service obligation,^{12/} the FCC has already decided that permitting states to include universal service funding in rates arbitrated under §§251 and 252 would violate the §§254(d) and 254(e) requirement that all universal service support be recovered in an equitable and nondiscriminatory manner from all providers of telecommunications services.^{13/} Such a mechanism would be discriminatory because it would exclude those carriers that did not purchase interconnection or unbundled network elements. In addition, in its Interconnection Order, the FCC reasoned that allowing states to inflate interconnection and unbundled network element prices with universal

^{10/} Recommended Decision at ¶ 808.

^{11/} Interconnection Order at ¶ 712.

^{12/} KMC does not agree with this statement and points out that the Joint Board did not cite any specific statutory language, legislative history, or Congressional intent to support its statement.

^{13/} Interconnection Order at ¶ 712.

service surcharges would introduce a non-cost based rate element and thereby violate the 1996 Act's requirement that interconnection and unbundled element prices be set at costs.^{14/} Thus, if the Joint Board's recommendation is adopted, the effect would be to: (1) add a universal service surcharge to interconnection and unbundled network elements that the FCC has explicitly prohibited states from adding; (2) introduce a charge that the FCC has found would be discriminatory because it does not apply to all telecommunications providers; and, (3) introduce a non-cost based rate element (the universal service surcharge) to the cost-based rates for interconnection and unbundled network elements. The FCC should not allow universal service surcharges to be applied to interconnection or unbundled network elements.

II. Subsidies Must Be Portable

Universal service subsidies must be portable in order to achieve a competitively neutral funding mechanism. Section 214(e) sets forth the criteria a carrier must meet in order to be eligible to receive universal service funding. KMC agrees with the Joint Board's recommendation that the FCC not impose eligibility criteria in addition to those contained in §214(e)(1).^{15/} KMC disagrees with the recommendation that the FCC adopt, without further elaboration, the statutory criteria contained in §214(e)(1).^{16/} KMC agrees with parties urging the

^{14/} Interconnection Order at ¶ 713.

^{15/} Recommended Decision at ¶ 155.

^{16/} Recommended Decision at ¶ 155.

FCC to clarify that carriers purchasing and combining unbundled network elements to provide universal service are included in the definition of eligible carriers.^{17/} Furthermore, although the Joint Board reached the opposite conclusion,^{18/} many parties suggested valid and compelling arguments to interpret §214(e) as including local resellers.^{19/} KMC urges the FCC to clarify the statutory criteria included in §214(e). Specifically, the FCC should state explicitly that pure resellers and carriers that purchase and combine unbundled network elements to provide service are providing services using a combination of their “own facilities and resale of another carriers’ services.”

The 1996 Act contemplates three paths of entry into the local market, through resale, purchase of unbundled elements, and construction of facilities, and does not express a preference for any one method.^{20/} The FCC has already rejected the argument that requiring carriers to own some local exchange facilities would promote competition in the local exchange market.^{21/} The FCC should not adopt rules in this proceeding that disadvantage one or more methods of market entry. All new entrants that provide service to low income customers, customers in high-cost

^{17/} CompTel Comments at 13; WorldCom, Inc. (“WorldCom”) at 14-15.

^{18/} Recommended Decision at ¶ 161.

^{19/} Excel Telecommunications, Inc. (“Excel”) Comments at 7-11; MFS Comments at 16-17; Telco Communications Group, Inc. (“Telco”) Comments at 5-7; Telecommunications Resellers Association (“TRA”) Comments at 13-14.

^{20/} Interconnection Order at ¶ 12.

^{21/} Interconnection Order at ¶ 340.

areas, and eligible schools, libraries, and rural health care providers must be eligible to receive any applicable universal service subsidies.

III. The Proxy Cost Model Must Be Based on Forward-Looking Economic Costs

The FCC should adopt the Joint Board's recommendation that the proxy cost model be based on an estimate of forward-looking economic costs rather than the embedded costs of the incumbent provider.^{22/} The Joint Board's objective in using a proxy cost model is to estimate the costs that "best approximate the costs that would be incurred by an efficient competitor entering that market."^{23/} Those forward-looking costs may not reflect an ILEC's embedded costs. Basing high-cost support on the actual, embedded costs of ILECs would unduly increase the size of the high-cost fund, create a make-whole mechanism that insulates ILECs from competition, and stifle incentives for investment in efficient forward-looking technologies.

Many of the ILECs argued that any proxy cost model adopted by the FCC must recognize the embedded costs that ILECs have a constitutional right to recover because of their "regulatory contract" with the government.^{24/} KMC respectfully suggests that these arguments are misplaced and rely, incorrectly, on a monopoly paradigm that has been eliminated by the 1996 Act. The

^{22/} Recommended Decision at ¶¶ 184, 270.

^{23/} Recommended Decision at ¶ 270.

^{24/} BellSouth Comments at 6-7; PacTel Comments at 7-8; SBC Comments at 23-24; US West Comments at 11.

1996 Act creates specific mechanisms to open the local exchange market to competition. While KMC acknowledges that the competitive goals of the 1996 Act have not been realized, some mechanisms necessary to achieve competition, such as the FCC's Interconnection Rules and state arbitration rules and competitive local exchange provider certification rules, have been adopted and are continuously being adopted in the post-1996 Act environment. Clearly, these mechanisms are intended to create a competitive local exchange market. In a competitive marketplace, there is no guarantee that a provider of telecommunications services will recover all of its costs or its investment. Certainly, KMC has no government guarantee that it will recover its investment, but is investing in facilities anticipating that it will offer services that customers find attractive and are willing to pay for. Adopting a regulatory mechanism that guarantees an incumbent total cost recovery is antithetical to the pro-competition intent the 1996 Act and the other actions the FCC and states have taken to introduce competition in local exchange markets. Obviously, insulating incumbent revenues and earnings from competition will disadvantage competition and new entrants like KMC.

The Joint Board proposes to use the proxy cost model as the basis for determining support in high-cost service areas. Under the Joint Board's recommendation, any eligible firm that provides service to customers who live in a high-cost area would receive the proxy-cost based subsidies. If the proxy cost model is calibrated based on the incumbent firm's embedded costs, that would essentially tie new entrants' support to the incumbents' costs. For example, if

KMC serves high cost areas in Virginia, it would not be sensible economic policy to compensate KMC based on Bell Atlantic's costs.

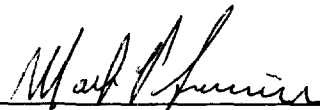
Even if the ILECs were correct in their assertion that they have a Constitutional right to recover their investments and retain their current revenues, basing the proxy cost model on the incumbents' costs does not create the opportunity for incumbent carriers to recover their investment. If a proxy cost model is based on an ILEC's embedded unit costs, an ILEC would have to continue to capture 100% of the market to cover its costs -- as long as there is no change in demand, any losses to competitors mean that ILECs would not cover their costs. If market demand is stimulated, as was the case with the introduction of competition in long distance markets, a proxy cost model based on an ILEC's embedded costs could result in a windfall where ILECs recover more than their costs and investment. Said differently, unless market demand is known (and market demand in the future competitive local exchange market is certainly not known or knowable) developing a proxy cost model based on an ILEC's costs yields no insights into the revenues an ILEC could earn.

A proxy cost model must not be based on the embedded costs of incumbent providers. The FCC should adopt the recommendation of the Joint Board and refine, in its upcoming proxy cost model workshops, a model that utilizes forward-looking economic costs.

IV. Conclusion

KMC commends the Joint Board for its Recommended Decision which addresses many of the critical issues of implementing the new universal service mechanisms mandated by the 1996 Act. KMC urges the FCC to continue its vigilance and apply the principle of competitive neutrality in promulgating new universal service rules. Consistent with that principle, the FCC should adopt universal service rules that (1) make universal service funding explicit through a surcharge on retail end users' bills; (2) base a carrier's universal service fund assessment on intra- and interstate gross revenues net of payments to other carriers; (3) prohibit ILECs from passing through their universal service fund assessment in the rates charged for elements and services under §§ 251 and 252; (4) make universal service subsidies fully portable to any carrier that provides universal service; and (5) use a proxy cost model based on forward-looking economic costs.

Respectfully submitted,



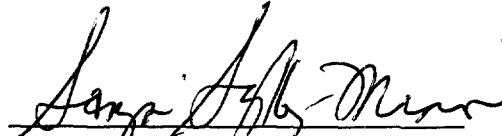
Mark P. Sievers
Tamar E. Haverty
SWIDLER & BERLIN, Chartered
3000 K Street, N.W., Suite 300
Washington, D.C. 20007
(202) 424-7500

January 10, 1997

Counsel for KMC Telecom, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of January 1997, copies of the foregoing REPLY
REPLY COMMENTS OF KMC TELECOM, INC., CC Docket No. 96-45 were sent via
Messenger** or via First-Class Mail, U.S. postage prepaid, to the persons on the attached service
list.



Sonja L. Sykes-Minor

THE HONORABLE WILLIAM F. CATON**
SECRETARY
1919 M STREET, N.W., ROOM 222
WASHINGTON, D.C. 20554

THE HONORABLE REED HUNDT, CHAIRMAN**
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET, N.W., ROOM 814
WASHINGTON, DC 20554

THE HONORABLE RACHELLE B. CHONG**
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET, N.W., ROOM 844
WASHINGTON, DC 20554

THE HONORABLE SUSAN NESS**
COMMISSIONER
FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET, N.W., ROOM 832
WASHINGTON, DC 20554

THE HONORABLE JULIA JOHNSON
COMMISSIONER, FLORIDA PSC
FLORIDA PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BOULEVARD
GERALD GUNTER BUILDING
TALLAHASSEE, FL 32399-0850

THE HONORABLE KENNETH MCCLURE
COMMISSIONER
MISSOURI PUBLIC SERVICE COMMISSION
301 W. HIGH STREET, SUITE 530
JEFFERSON CITY, MO 65101

THE HONORABLE SHARON NELSON, CHAIRMAN
WASHINGTON UTILITIES & TRANSPORTATION
COMMISSION
1300 SOUTH EVERGREEN PARK DRIVE, S.W.
OLYMPIA, WA 98504-7250

THE HONORABLE LASKA SCHOENFREKLER
COMMISSIONER, SD PUC
SOUTH DAKOTA PUBLIC UTILITIES COMMISSION
STATE CAPITOL, 500 EAST CAPITOL STREET
PIERRE, SD 57501-5070

THE HONORABLE MARTHA HOGERTY
PUBLIC COUNSEL - MO OPC SECRETARY OF NASUCA
MISSOURI OFFICE OF PUBLIC COUNCIL
301 WEST HIGH STREET
HARRY S. TRUMAN BLDG., ROOM 250
JEFFERSON CITY, MO 65101

PAUL FEDERSON
MISSOURI PUBLIC SERVICE COMMISSION
301 W. HIGH P.O. BOX 360
JEFFERSON CITY, MISSOURI 65101

LISA BOEHLEY**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8605
WASHINGTON, DC 20554

CHARLES BOLLE
SOUTH DAKOTA PUBLIC UTILITIES COMMISSISON
STATE CAPITAL
PIERR, SOUTH DAKOTA 57501

DEONNE BRUNING
NEBRASKA PUBLIC SERVICE COMMISSION
300 THE ATRIUM
1200 N STREET, P.O. BOX 94927
LINCOLN, NE 68509-4927

LORI KENYON
ALASKA PUBLIC UTILITIES COMMISSION
1016 WEST 6TH AVENUE, SUITE 400
ANCHORAGE, AK 99501

DEBRA KRIETE
PENNSYLVANIA PUBLIC UTILITY COMMISSION
P.O. BOX 3265
HARRISBURG, PA 17105-3265

MARK LONG
FLORIDA PUBLIC SERVICE COMMISSION
2540 SHUMARD OAK BOULEVARD
TALLAHASSEE, FLORIDA 32399-0866

SAM LOUDENSLAGER
ARKANSAS PUBLIC SERVICE COMMISSION
1000 CENTER STREET, P.O. BOX 400
LITTLE ROCK, ARKANSAS 72203-0400

SANDRA MAKEEFF
IOWA UTILITIES BOARD
LUCAS STATE OFFICE BUILDING
DES MOINES, IA 50319

PHILIP MCCLELLAND
PA OFFICE OF CONSUMER ADVOCATE
1425 STRAWBERRY SQUARE
HARRISBURG, PA 17120

MICHAEL MCRAE
DC OFFICE OF THE PEOPLE'S COUNSEL
1133 15TH STREET N.W., SUITE 500
WASHINGTON, DC 20005

TERRY MONROE
NEW YORK PUBLIC SERVICE COMMISSION
3 EMPIRE STATE PLAZA
ALBANY, NY 12223

LEE PALAGYI
WASHINGTON UTILITIES AND TRANSPORTATION
1300 SOUTH EVERGREEN PARK DRIVE, S.W.
OLYMPIA , WA 98504

BARRY PAYNE
INDIANA OFFICE OF CONSUMER COUNSEL
100 NORTH SENATE AVENUE, ROOM N501
INDIANAPOLIS, INDIANA 46204-2208

JAMES BRADFORD RAMSAY
NATIONAL ASSOCIATION OF REGULATORY UTILITY
COMMISSIONERS
P.O. BOX 684
WASHINGTON, DC 20044-0684

BRIAN ROBERTS
CALIFORNIA PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102

JOHN NAKAHTA**
FEDERAL COMMUNICATIONS COMMISSISON
COMMISSIONER NESS' OFFICE
1919 M STREET, N.W., ROOM 814
WASHINGTON, DC 20554

JAMES CASSERLOY**
FEDERAL COMMUNICATIONS COMMISSISON
COMMISSIONER NESS' OFFICE
1919 M STREET, N.W., ROOM 832
WASHINGTON, DC 20554

DANIEL GONZALEZ**
FEDERAL COMMUNICATIONS COMMISSISON
COMMISSIONER NESS' OFFICE
1919 M STREET, N.W., ROOM 844
WASHINGTON, DC 20554

JOHN CLARK**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8619
WASHINGTON, DC 20554

BRYAN CLOPTON**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8615
WASHINGTON, DC 20554

EMILY HOFFMAR**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8623
WASHINGTON, DC 20554

L. CHARLES KELLER**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8918
WASHINGTON, D.C. 20554

DAVID KRECH**
FEDERAL COMMUNICATIONS COMMISSION
2025 M STREET, N.W., ROOM 7130
WASHINGTON, D.C. 20554

DIANE LAW**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, ROOM 8920
WASHINGTON, D.C. 20554

ROBERT LOUBE**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, ROOM 8914
WASHINGTON, D.C. 20554

TEJAL MAHTA**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8625
WASHINGTON, D.C. 20554

JOHN MORABITO**
DEPUTY DIVISION CHIEF, ACCOUNTING AND AUDITS
FEDERAL COMMUNICATIONS COMMISSION
2000 L STREET, N.W., SUITE 812
WASHINGTON, D.C. 20554

MARK NADEL**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8916
WASHINGTON, D.C. 20554

KIMBERLY PARKER**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8609
WASHINGTON, D.C. 20554

JEANINE POLTRONIERI**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8924
WASHINGTON, D.C. 20554

GARY SEIGEL**
FEDERAL COMMUNICATIONS COMMISSION
2000 L STREET, N.W., ROOM 812
WASHINGTON, D.C. 20554

RICHARD SMITH**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8605
WASHINGTON, D.C. 20554

PAMEL SZYMCAK**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8912
WASHINGTON, D.C. 20554

LORI WRIGHT**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8603
WASHINGTON, D.C. 20554

IRENE FLANNERY**
FEDERAL COMMUNICATIONS COMMISSION
2100 M STREET, N.W., ROOM 8922
WASHINGTON, D.C. 20554

SHERYL TODD (VIA DISKETTE)**
COMMON CARRIR BUREAU
2100 M STREET, N.W.
ROOM 8611
WASHINGTON, D.C. 20554

INTERNATIONAL TRANSCRIPTION SERVICE**
2100 M STREET, N.W.
ROOM 140
WASHINGTON, D.C. 20054